

## EXHIBIT 2

11/08/2018

Via Email

Paul D. Polidoro  
Legal Department  
100 Watchtower Drive  
Patterson, NY 12563  
ppolidor@iw.org

Re: Your subpoena to Facebook, Inc. our ref. L# 2109204

Counsel,

Facebook received a subpoena from you issued on behalf of a private, non-governmental party on 11/6/18 (Case# 18-mc-471) seeking information associated with a purported Facebook account. Facebook objects to your subpoena for the reasons below. Please review this information, as well as information available in [Facebook's Help Center, located at <http://www.facebook.com/help/>]. Facebook reserves all objections and rights.

Your subpoena is not issued from a court with subpoena power over Facebook.

This letter is not intended by Facebook, and should not be construed by you, as consent by Facebook to the jurisdiction or subpoena power of the issuing court.

### **Requests for Account Details and Non-Content Information**

If you are seeking non-content basic subscriber information associated with a user account, your subpoena is not otherwise objectionable, and your subpoena uniquely identifies an account by URL or email address, Facebook may produce reasonably available basic subscriber information, if any, after providing 21-days notice to the user of an affected account. If you wish to proceed with this limited scope of discovery, please contact us.

### **Additional Considerations and Objections**

Facebook cannot respond to subpoenas containing requests that are overly broad, unduly burdensome, vague, or not reasonably calculated to lead to the discovery of admissible evidence. Please ensure that you have identified a unique user account by URL or email address and that your request is appropriately date and field limited.

Facebook objects to all requests that seek protected or privileged information, including information protected by the attorney-client or other applicable privilege, or confidential, proprietary, or trade secret information.

Facebook is not in a position to authenticate or verify account content. Such requests

should be directed to the creator or recipient of the content. Facebook also is not in a position to provide witnesses for trial or deposition. The appearance of a records custodian is unnecessary because any non-content records produced are self-authenticating.

Finally, Facebook does not preserve information in response to third party subpoenas or private party or non-governmental requests. Such requests should be directed to the user.

Please correct all deficiencies in your subpoena before re-serving.

Sincerely,

Facebook Legal